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BUTCH TONGATE
Cabinet Secretary
J.C. BORREGO
Deputy Secretary

Certified Mail - Return Receipt Requested

April 26, 2017

Mr. Mike Addy, Owner
Albuquerque Vault Company
300 Airport Rd. NW
Albuquerque, NM 87121

**RE: Albuquerque Vault Company; Industrial Permit; SIC 3272; NPDES Compliance
Evaluation Inspection; NPDES NMU001933; April 12, 2017**

Dear Mr. Addy:

Enclosed please find a copy of the report for the referenced inspection that the New Mexico Environment Department (NMED) conducted at your facility on behalf of the U.S. Environmental Protection Agency (USEPA). This inspection report will be sent to the USEPA in Dallas, for their review. These inspections are used by USEPA to determine compliance with the National Pollutant Discharge Elimination System (NPDES) permitting program in accordance with requirements of the federal Clean Water Act.

Problems noted during this inspection are listed in the report. You are encouraged to review the inspection report, required to correct any problems noted during the inspection, and to modify your operational and/or administrative procedures, as appropriate. If you have comments on or concerns with the basis for the findings in the NMED inspection report, please contact us (see the address above) in writing within 30 days from the date of this letter. Further, notify in writing both USEPA (David Long, USEPA (6EN-WM), 1445 Ross Ave., Suite 1200, Dallas, Texas, 75202), and NMED regarding modifications and compliance schedules. If you have any questions about this inspection report, please contact Daniel Valenta at 505-827-2575 or at daniel.valenta@state.nm.us.

Sincerely,

/s/Sarah Holcomb

Sarah Holcomb
Program Manager
Point Source Regulation Section
Surface Water Quality Bureau

Cc: Robert Houston, USEPA (6EN-WS) by e-mail
Carol Peters-Wagnon, USEPA (6EN-WM) by e-mail
Dave Long, USEPA (6EN-WM) by e-mail
Darlene Whitten-Hill, USEPA (6EN) by e-mail
NMED District I, William Chavez by e-mail



Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

NPDES Compliance Inspection Report

Section A: National Data System Coding

Transaction Code	NPDES	yr/mo/day	Inspec. Type	Inspector	Fac Type
1 N 2 5 3 N M U 0 0 1 9 3 3 11 12 1 7 0 4 1 2 17 18 ~ 19 S 20 2					
Remarks					
S C R A P M E T A L R E C Y C L I N G					
Inspection Work Days	Facility Evaluation Rating	BI	QA	Reserved	
67 69	70 2	71 N 72 N 73 74 75 80			

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)	Entry Time /Date 1024 Hours/4-12-2017	Permit Effective Date 6-4-2015
Albuquerque Vault Company; 300 Airport Rd. NW; Albuquerque, New Mexico 87121 Bernalillo County	Exit Time/Date 1134 Hours/4-12-2017	Permit Expiration Date 6-4-2020
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data	
Mr. Mike Addy/Company Owner/ 505-826-4404/505-264-6900	N. 35.083 W. -106.71494	
Name, Address of Responsible Official/Title/Phone and Fax Number	SIC 3272 Sector E	
Mr. Mike Addy/300 Airport Rd. NW; Albuquerque, NM 87121 / Company Owner/ 505-826-4404/505-264-6900	Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

U	Permit	N	Flow Measurement	M	Operations & Maintenance	N	CSO/SSO
U	Records/Reports	N	Self-Monitoring Program	N	Sludge Handling/Disposal	N	Pollution Prevention
M	Facility Site Review	N	Compliance Schedules	N	Pretreatment	N	Multimedia
N	Effluent/Receiving Waters	N	Laboratory	M	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

1. Inspectors arrived on site at 1024 on 4/12/2017, conducted entrance interview with Mr. Mike Addy, during which the Inspectors made introductions, showed credentials and explained the purpose of the inspection.
2. This report is based on a review of the files maintained by the permittee and NMED, on-site observations by NMED personnel, and verbal information provided by the facility's representative.
3. An exit interview to discuss the preliminary finding of the inspection was conducted at approximately 1134 on 4/12/2017 with Mr. Mike Addy at the site.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
DANIEL VALENTA /s/Daniel Valenta	NMED/SWQB 505-827-2575	4/24/2017
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date
SARAH HOLCOMB /s/Sarah Holcomb	505-827-2798	4/26/2017

Albuquerque Vault Company
NMU001933
April 12, 2017

Further Explanation

Introduction

On April 12, 2017, a Compliance Evaluation Inspection (CEI) was conducted at Albuquerque Vault Company, 300 Airport Rd. NW, Albuquerque, New Mexico 87121 in Bernalillo County by Mr. Daniel Valenta and Ms. Sandra Gabaldon of the New Mexico Environment Department (NMED) Surface Water Quality Bureau (SWQB). The purpose of this inspection was to document the operator's status regarding the National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges associated with industrial activity under 40 Code of Federal Regulations (CFR) 122.26 and the industrial stormwater Multi-Sector General Permit (MSGP). Albuquerque Vault Company is a Concrete Products facility (see Standard Industrial Classification (SIC) code 3272) that meets the description in Category 40 CFR 122.26(b)(14), and Sector E of the MSGP.

Upon arrival at 1024 hours on April 12, 2017 the inspectors made introductions, stated the purpose of the inspection and presented credentials to the Owner, Mr. Addy. The inspector briefly toured the facility. Following the tour, an on-site exit interview to discuss preliminary findings was conducted with Mr. Addy. The inspector left the facility at approximately 1134 hours.

Albuquerque Vault Company was established in 1961 with an original goal of supplying local and regional cemeteries with concrete burial vaults or liners. With a need to increase income precast concrete septic tanks were quickly added. In 1983 the company was incorporated. Manhole products were steadily integrated to the daily production list. The current location was purchased in 2002 and started producing from 300 Airport Road in January 2003. They are still diversifying and adding or changing products as needed by the current market.

This report is based on review of EPA's on-line notice of intent (eNOI & ICIS) database, files maintained by NMED, and on-site observation by NMED personnel, and verbal information provided by the operator's on-site representative.

Storm water may discharge to the Albuquerque MS4 thence to the Rio Grande in the Rio Grande Basin, Segment 20.6.4.105 of the State of New Mexico Standards for Interstate and Intrastate Surface Waters, New Mexico Administrative Code (NMAC). Designated uses are irrigation, marginal warm water aquatic, livestock watering, public water supply, wildlife habitat, and primary contact.

Clean Water Act (CWA) and Industrial Stormwater Permit Requirements

Section 301 (a) of the Federal Water Pollution Control Act states that *"Except as in compliance with this section and sections 302, 306, 307, 318, 402 and 404 of this Act, the discharge of any pollutant by any person shall be unlawful."* Federal regulations in 40 CFR Part 122.21(a) Duty to apply (1) states: *"Any person who discharges or proposes to discharge pollutants...must submit a complete application to the Director in accordance with this section and part 124 of this chapter."*

The USEPA's MSGP was re-issued effective June 4, 2015. It replaced the 2008 MSGP which expired on September 29, 2013.

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Common requirements for coverage under an industrial stormwater permit include development of a written stormwater pollution prevention plan (SWPPP), implementation of control measures, and submittal of a request for permit coverage, usually referred to as the Notice of Intent or NOI. The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at your facility to minimize the discharge of these pollutants in runoff from the site.

These control measures include site-specific best management practices (BMPs), maintenance plans, inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site.

The industrial stormwater permit also requires collection of visual, analytical, and/or compliance monitoring data to determine the effectiveness of implemented BMPs. For more information on EPA's industrial stormwater permit go to <https://www.epa.gov/npdes/stormwater-discharges-industrial-activities>.

A SWPPP should include the following information:

- A description of potential pollutant sources – includes a site map, an identification of the types of pollutants that are likely to be present in stormwater discharges, an inventory of the types of materials handled at the site that potentially may be exposed to precipitation, a list of significant spills and leaks of toxic or hazardous pollutants, sampling data, a narrative description of the potential pollutant sources from specific activities at the facility, and identification of specific potential pollutants; and
- A description of appropriate measures and controls – includes the type and location of existing and proposed non-structural and structural best management practices (BMPs) selected for each of the areas where industrial materials or activities are exposed to stormwater. Non-structural and structural BMPs to be described and implemented include such things as good housekeeping, preventive maintenance, spill prevention and response procedures, periodic inspections, employee training, record keeping, non-storm water evaluations and certifications, sediment and erosion control, as well as implementation/maintenance of traditional stormwater management practices, where appropriate.

An industrial stormwater fact sheet for Sector E: Concrete Products Facilities including a summary of typical pollutants associated with activities and types of stormwater control measures (BMPs) used to minimize the discharge of those pollutants is available at USEPA's website: <https://www.epa.gov/npdes/industrial-stormwater-fact-sheet-series>.

Pollutants Associated With Material Stockpiling.

Facilities primarily engaged in manufacturing concrete products, including ready mixed concrete, are identified as SIC group 3272. Although concrete product facilities in SIC group 3272 produce a variety of final products, they all have common raw materials and activities. Concrete products manufacturers combine cement, aggregate, and water to form concrete. Aggregate generally consists of: sand, gravel, crushed stone, cinder, shale, slag, clay, slate, pumice, vermiculite, scoria, perlite, diatomite, barite, limonite, magnetite, or ilmenite.

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Admixtures including fly ash, calcium chloride, triethanolamine, calcium salt, lignosulfonic acid, vinosol, saponin, keratin, sulfonated hydrocarbon, fatty acid glyceride, vinyl acetate, and styrene copolymer of vinyl acetate may be added to obtain desired characteristics, such as slower or more rapid curing times. Typically, aggregate is received in bulk quantities by rail, truck, or barge. It is stored outside, and kept moist, until it is conveyed to distribution bins. The first stage in the manufacturing process is proportioning cement, aggregate, admixtures and water, and then transporting the product to a rotary drum, or pan mixer.

Findings

As of the time of the inspection the facility did not have an active MSGP in place. No SWPPP has been prepared and no NOI submitted.

The site appeared to be fairly level, there were several small depressions where water would collect. Close to the raw materials storage area is a pit where wash water is directed and rain water falling on the raw materials would flow. Along the east side of the property there appeared to be several spots along the fence where discharges were occurring from the roof and scrap storage areas. There was no BMP in place to prevent track out at the entrance/exit of the facility. The site was organized and clean. The mixing and pouring of concrete into the forms is conducted within a large building and not open to stormwater. See attached photo's.

Official Photograph Log

Photo # 1

Photographer: Daniel Valenta	Date: 4/12/2017	Time: 1114 hours
City/County: Albuquerque/Bernalillo		
Location: 300 Airport Rd. NW		
Subject: Concrete is poured into metal molds inside an enclosed shop.		



**NMED/SWQB
Official Photograph Log**

Photo # 2

Photographer: Daniel Valenta	Date: 4/12/2017	Time: 1116 hours
City/County: Albuquerque/Bernalillo		
Location: 300 Airport Rd. NW		
Subject: Raw materials are stored in silos outside of shop.		



**NMED/SWQB
Official Photograph Log**

Photo # 3

Photographer: Daniel Valenta	Date: 4/12/2017	Time: 1103 hours
City/County: Albuquerque/Bernalillo		
Location: 300 Airport Rd. NW		
Subject: Discharges from facility down cut rills on property next to site.		



**NMED/SWQB
Official Photograph Log**

Photo # 4

Photographer: Daniel Valenta	Date: 4/12/2017	Time: 1100 hours
City/County: Albuquerque/Bernalillo		
Location: 300 Airport Rd. NW		
Subject: Discharges from facility down cut rills on property next to site.		



**NMED/SWQB
Official Photograph Log**

Photo # 5

Photographer: Daniel Valenta	Date: 4/12/2017	Time: 1050 hours
City/County: Albuquerque/Bernalillo		
Location: 300 Airport Rd. NW		
Subject: Material is tracked offsite at the entrance/exit to facility.		

